

UNITED STATES DISTRICT COURT
for the
DISTRICT OF MASSACHUSETTS

FOUR WOMEN HEALTH SERVICES, LLC,
Plaintiff

CIVIL ACTION No: 1:24-CV-12283-JEK

vs.

ABUNDANT HOPE PREGNANCY
RESOURCE CENTER INC., d/b/a
ATTLEBORO WOMEN'S HEALTH
CENTER, CATHERINE ROMAN, NICOLE
CARGES, and DARLENE HOWARD,
Defendants

**DEFENDANTS' RESPONSE TO PLAINTIFF'S PROPOSED
EXPEDITED DISCOVERY AND PRELIMINARY INJUNCTION SCHEDULE**

Pursuant to the Court's Order, ECF 37, the Defendants hereby respond to the Plaintiff's proposed schedule for expedited discovery and preliminary injunction. The Defendants have no objection to the Plaintiff's proposed schedule but, based on the below argument, submit that expedited discovery may not be needed at all.

The Defendants object to Paragraph 7 of the Plaintiff's [Proposed] Qualified Protective Order and Pseudonym Use. The basis of the objection is that the terms of Paragraph 7 prohibit informal discovery requests. In this regard, the Defendants' counsel has recently requested the Plaintiff's counsel to produce to him the names of Jane Doe #5 through #8 (with appropriate confidentiality assurances). The Defendants' belief is that, if they have the names of these Jane Does, they can quickly produce documentation showing that the Jane Does initiated the contact with the Defendants - and thus likely disproving the Plaintiff's claims that the Defendants hacked

into Plaintiff's computer system. That would appear to possibly terminate this case early and certainly make any expedited discovery schedule unnecessary. For it is the Plaintiff's claim that expedited discovery is needed to support a preliminary injunction. The Defendants' documentation will show that there is no computer fraud and thus no need for a preliminary injunction – and therefore no need for expedited discovery.

Respectfully submitted,

The Defendants, Abundant Hope Pregnancy
Resource Center, d/b/a Attleboro Women's Health
Center, Catherine Roman, Nicole Carges, and
Darlene Howard,
By Their Attorney,

/s/ Thomas M. Harvey

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Date: 10-3-24

CERTIFICATE OF SERVICE

I, Thomas M. Harvey, certify that on October 3, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Plaintiff by electronically serving its counsel of record.

/s/ Thomas M. Harvey

Thomas M. Harvey